

SEALED

JLK/BC:USAO#2012R00108

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
IN THE UNITED STATES DISTRICT COURT
~~FOR THE DISTRICT OF MARYLAND~~
2013 DEC 11

CLERK'S OFFICE:
BALTIMORE : UNITED STATES OF AMERICA : CRIMINAL NO. GLR-13-0677

v.

BY _____ DEPUTY

STEVEN JACKSON,	:	(Conspiracy to Participate in a
a/k/a Cutty,	:	Racketeering Enterprise, 18 U.S.C.
EUGENE ANDERSON,	:	§ 1962(d); Conspiracy to Distribute and
a/k/a Petey,	:	Possess with Intent to Distribute
ASIM BENNS,	:	Controlled Substances, 21 U.S.C. § 846)
a/k/a Seem,	:	
RONALD HALL,	:	
a/k/a JJ,	:	
DELANO JOHNSON,	:	
a/k/a Lano,	:	
TONY JOHNSON,	:	
a/k/a Tony Mack,	:	
RASHAUD KEARNEY,	:	
a/k/a TT,	:	
RUSSELL LUMPKINS,	:	
a/k/a Mr. Man,	:	
DEMOND PINKNEY,	:	
a/k/a Cal,	:	
CLARENCE SHIPLEY,	:	
a/k/a Mook,	:	
WILLIAM SIMMONS,	:	
a/k/a Big Chew,	:	
GREGORY SYKES-BEY,	:	
BRYAN TURNER,	:	
a/k/a BT,	:	
ANTIONE WHITE,	:	
a/k/a Twan,	:	
and	:	
ROBERT WOODARD, JR.,	:	
a/k/a Hanky,	:	

Defendants.

.oOo.

GOVERNMENT'S MOTION TO SEAL INDICTMENT

The United States of America, by and through its attorneys, Rod J. Rosenstein, United States Attorney for the District of Maryland, and Brooke E. Carey and Joshua L. Kaul, Assistant United States Attorneys for said District, files this motion to seal the indictment in the above numbered and styled cause, and in support thereof states the following:

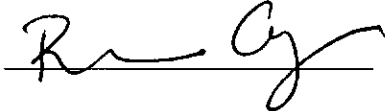
1. On December 11, 2013, the Defendants were indicted in a two-count Indictment charging as Count One, Conspiracy to Participate in Racketeering Activity in violation of 18 U.S.C. section 1962(d); and Count Two, Conspiracy to Distribute 1 kilogram or more of heroin, 280 grams or more of cocaine base, a quantity of cocaine and a quantity of oxycodone in violation of Title 21 U.S.C. section 846..

2. Arrest warrants have been issued for the Defendants. If the indictment was made public, it may hinder, compromise, or jeopardize the apprehension of the Defendants. Until such time as the Defendants are apprehended, it is requested that the indictment filed in this matter be sealed. It is further requested that in the event one or more, but not all the Defendants are apprehended, that a redacted copy of the indictment, disclosing only the name of the individual arrested be provided to that individual and his/her counsel.

WHEREFORE, it is respectfully requested that the indictment in the above-captioned matter and the instant motion be SEALED and remain sealed until all named Defendants have been arrested, or until further order of the Court.

Respectfully Submitted,

ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

By: 

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